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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**MIDLAND ROSS CORPORATION
TOLEDO, OHIO
OHD 097 232 946**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Midland Ross Corporation (Midland Ross) facility in Toledo, Lucas County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing Resource Conservation and Recovery Act (RCRA) facilities for corrective action.

Midland Ross was a manufacturer of furnaces and incinerators. Midland Ross Surface Combustion Division manufactured furnaces and incinerators at this facility, and Midland Ross Thermal Systems Division conducted research at this facility involving furnaces and incinerators.

In 1985, Midland Ross was bought by Fosterman Little (FL) Aerospace, and the two divisions were combined into one called Surface Combustion Division. The Midland Ross name was retained until 1988, when the Surface Combustion Division separated from FL Aerospace and became Surface Combustion, Inc. (Surface Combustion). The Midland Ross name was then dropped by FL Aerospace. Surface Combustion continues to manufacture furnaces and incinerators, though not at this facility. Surface Combustion's current activity at this facility involves testing nonhazardous wastes in the pilot scale incinerator that was operated by Midland Ross.

Before 1986, Midland Ross (and FL Aerospace, when it bought Midland Ross) owned the properties located at 900 North Westwood Avenue and 2375 Dorr Street, which were comprised of about 25 acres in an industrial, commercial, and residential area in Toledo, Lucas County, Ohio. (Throughout this report, these properties are collectively referred to as the Midland Ross facility, although Midland Ross no longer exists as a corporation.) In 1986, the North Westwood Avenue property was bought by Giant Products Corporation, which is the current owner of the property. In 1988, FL Aerospace sold the Dorr Street property to its current owner, J & G Corporation (J & G). Operations at the Midland Ross facility no longer involve the management of hazardous waste.

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Midland Ross managed hazardous waste at North Westwood Avenue from December 1977 to mid-1985 and at Dorr Street from 1986 to 1988, and, in 1989, Surface Combustion RCRA-closed the hazardous waste management units at Dorr Street. Midland Ross' initial Part A permit application, dated October 6, 1981, was for container storage (S01) and incineration (T03) at North Westwood Avenue. Midland Ross operated a batch pyrolyzer and an incinerator for generating incineration equipment design data. In 1985, FL Aerospace consolidated Midland Ross operations and relocated the S01 and T03 units to Dorr Street. RCRA closure of these two units at North Westwood Avenue was completed on December 9, 1986. A revised Part A permit application, dated September 10, 1985, was submitted by Midland Ross to the Ohio Environmental Protection Agency (OEPA) to clarify the new locations of the S01 and T03 units at Dorr Street. It also served to clarify the treatment process by adding T04 (treatment in a unit other than a tank, surface impoundment, or incinerator) as a process unit. (The T04 process code referred to the batch pyrolyzer connected to the incinerator.) The S01, T03, and T04 units at Dorr Street underwent RCRA closure on August 11, 1989. Currently, Surface Combustion leases from J & G Corporation about 500 to 600 square feet of space at 2375 Dorr Street, where it continues to operate this incineration test equipment using only nonhazardous waste. The companies operating at North Westwood Avenue (Giant Products Corporation and Builders Steel) do not manage hazardous waste.

Wastes used in the incinerator tests were received by Midland Ross and, later, by Surface Combustion from only companies (potential customers) considering the purchase of Midland Ross incineration equipment. The only wastes generated on site were, and are, generated by the incinerator tests. Prior to RCRA closure, the two types of hazardous waste that were typically received from off site were paint sludge (F003 and F005) and waste paint (D001). Consequently, the most typical hazardous waste generated on site was residue from the incineration of these paint-related wastes. All wastes, including treated waste, residual untreated waste, and scrubber wastewater, were returned to the potential customer after the tests were complete. The scrubber has never been used at Dorr Street, and Surface Combustion currently receives only nonhazardous wastes such as fiberglass.

The PA/VSI identified the following six SWMUs and two AOCs at the facility:

Solid Waste Management Units

1. Former Pyrolyzer/Incinerator
2. Former Indoor Container Storage Unit

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3. Outdoor Container Storage Unit
4. Pyrolyzer/Incinerator
5. Container Storage Unit
6. Former Wastewater Treatment Works

Areas of Concern

1. Stained Soil Between Buildings
2. East Parking Lot

The facility is bordered on the north by a cemetery, on the west by a commercial business and one residence, on the south by a commercial business, and on the east by residences and light industrial businesses. The nearest residence is located about 100 feet west of the facility. Thirteen schools and one park are located within 2 miles of the facility. One of the thirteen schools is located about three tenths of a mile from the facility. Five of the thirteen schools and the park are located between one-half mile and one mile from the facility. Seven of the thirteen schools are located between one mile and two miles from the facility. Access to the facility is restricted by a perimeter fence; however, access through fence gates is not monitored, and open gates were observed during the VSI. Several open and unmonitored garage doors that allowed unrestricted access to the facility were observed at North Westwood Avenue and Dorr Street. No Surface Combustion employees regularly work at the facility because the incinerator is operated only three or four times per year.

The nearest surface water is the Ottawa River, which is located 0.7 mile northwest of the facility and is used for recreational purposes. The Ottawa River flows northeast and discharges into Lake Erie. Williams Ditch intersects the facility property boundary; however, Williams Ditch does not regularly contain surface water, and the ditch is not considered a wetland. Another surface water body in the area is the Maumee River, which is more than 2 miles southeast of the facility and is used for recreational purposes.

Ground water in the area is not used as a municipal or private water supply.

No sensitive environments are located on site. The 100-year flood zone follows the path of Williams Ditch, which is a predominantly dry ditch that crosses the southeast corner of the facility. However, Williams Ditch is not a sensitive environment. The nearest sensitive environment is a palustrine, forested wetland located 0.8 mile southwest of the facility.

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The potential for release to ground water, surface water, air, and on-site soils is low for SWMUs 1, 2, 5, and 6. These SWMUs are no longer in use, and SWMUs 1, 2, and 5 underwent RCRA closure. The probability that a release from SWMUs 1, 2, and 5 to ground water, surface water, air, and on-site soils has occurred in the past is low, because each of these SWMUs had concrete floors as release controls. The probability that a release from SWMU 6 to ground water, surface water, air, or on-site soils occurred in the past is low, because there was no information indicating whether Midland Ross ever exceeded the permit restrictions for this SWMU.

The potential for release to ground water, surface water, air, and on-site soils is low for SWMU 4. This SWMU has a release control (concrete floor located within a building), and hazardous constituents in the waste being treated were volatilized and incinerated.

The Outdoor Container Storage Unit (SWMU 3) has a low potential for release to ground water, surface water, air, and on-site soils, because the container of waste stored in this unit has been removed. Only minor staining was observed during the VSI. However, the probability that a release to ground water, air, and on-site soils has occurred in the past is moderate. In August 1990, Environmental Consultants, Inc. (ECI), representing Giant Products Corporation, performed a Phase I Environmental Site Assessment (Phase I Assessment) and observed drums of unknown contents leaking in this SWMU, which consists of an asphalt surface that has several cracks. Since surface water is not found in close proximity to this SWMU, the probability that a release to surface water has occurred in the past is low.

PRC recommends no further action for SWMUs 4, 5, and 6. PRC recommends closure equivalency demonstrations be performed for SWMUs 1 and 2. PRC recommends sampling the soil below the asphalt surface of the Outdoor Container Storage Unit (SWMU 3) and analyzing the soil samples for heavy metals and organic solvents.

In August 1990, ECI also observed two on-site areas that PRC considers AOCs. AOC 1 is Stained Soil Between Buildings (AOC 1). ECI did not investigate this observation further. During the VSI, PRC did not know about the presence of AOC 1. Incidental observation of the AOC provided no information confirming the existence of a stain between the buildings. PRC recommends additional and thorough observation of this area and soil sampling and analysis for contaminants if staining is confirmed.

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The East Parking Lot (AOC 2) was described in ECI's Phase I Assessment as a former storm water retention pond used by a company (Owens-Illinois) located on the adjacent property north of 900 North Westwood Avenue. The date that the pond was filled in and converted to a parking lot is not known. The Phase I Assessment includes information regarding a subsurface investigation by Toledo Testing Laboratory, Inc., for Giant Products Corporation in September 1986. Analysis of soil samples collected at 5 feet and 10 feet below the surface showed low levels of heavy metals (2.8 parts per million barium). However, a metal detector detected several areas with high subsurface magnetic response. The magnetic response observed indicated that the subsurface objects were larger than 2 feet across. PRC recommends investigating the presence of drums or tanks below the East Parking Lot (AOC 2) and sampling of soils in areas suspected of containing buried drums or tanks.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Midland Ross Corporation (Midland Ross) facility (EPA Identification No. OHD 097 232 946) in Toledo, Lucas County, Ohio. The PA was completed on September 8, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on September 10, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified six SWMUs and two AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and six inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors. Figure 1 shows the facility location. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.1 FACILITY LOCATION

This report addresses two contiguous properties located at 900 North Westwood Avenue and 2375 Dorr Street in Toledo, Lucas County, Ohio, which were formerly owned and operated by Midland Ross (Midland Ross, 1985a). Throughout this report, these properties are collectively referred to as the Midland Ross facility, though Midland Ross no longer exists. The Midland Ross facility occupies about 25 acres in an industrial, commercial, and residential area. Figure 1 shows the location of the Midland Ross facility in relation to the surrounding topographic features (latitude 41°38'59" N and longitude 83°36'18" W). Figure 2 shows the location of SWMUs and AOCs at 900 North Westwood Avenue and 2375 Dorr Street.

The facility is bordered on the north by a cemetery, on the west by commercial businesses and one residence, on the south by a commercial business, and on the east by residences and light industrial businesses.

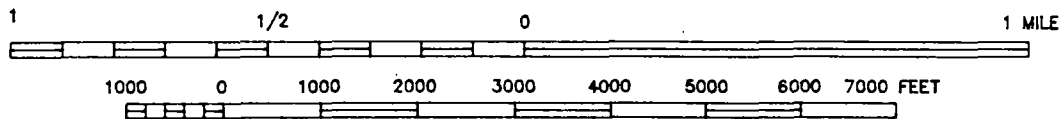
2.2 FACILITY OPERATIONS

Midland Ross was a manufacturer of industrial process furnaces for steel, glass, aluminum, and other industries. Midland Ross also operated a pilot-scale incinerator (SWMUs 1 and 4) to generate incineration equipment design data.

The oldest records available regarding ownership of the facility indicate that the first occupant and owner of the North Westwood Avenue property was a foundry named Toledo Machine and Tool Company, which operated from 1917 to 1944. E.W. Bliss Company, apparently a foundry, owned and occupied the property from 1944 to 1959. Midland Ross purchased the North Westwood Avenue property in late 1959 (ECI, 1990).



SCALE 1:24000



SCALE 1"=2,000'

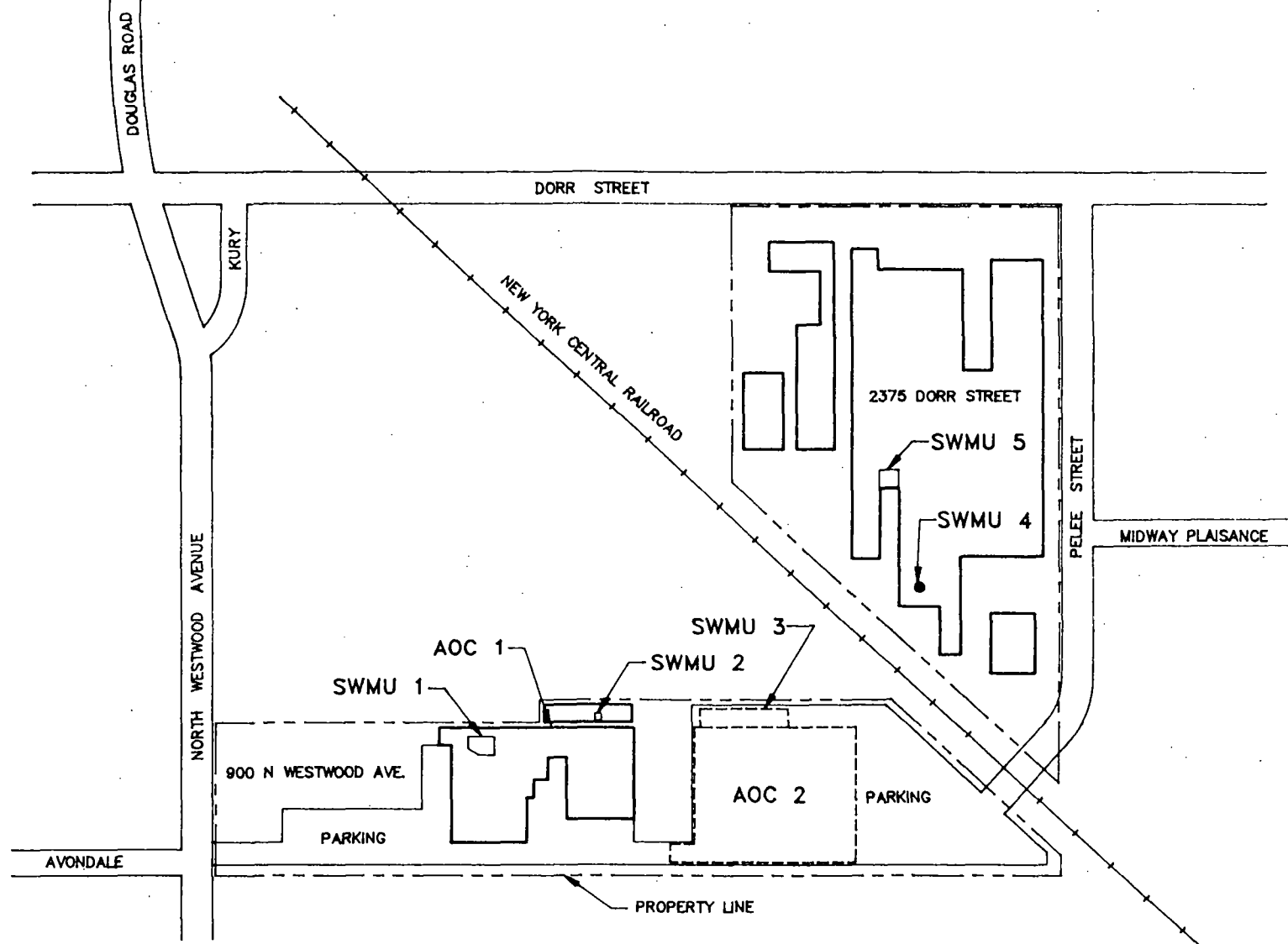


SOURCE: MODIFIED FROM USGS, TOLEDO QUADRANGLE, 1980

MIDLAND ROSS SURFACE COMBUSTION DIVISION
TOLEDO, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.



LEGEND

- SWMU 1 FORMER PYROLYZER/INCINERATOR
- SWMU 2 FORMER INDOOR CONTAINER STORAGE UNIT
- SWMU 3 OUTDOOR CONTAINER STORAGE UNIT
- SWMU 4 PYROLYZER/INCINERATOR
- SWMU 5 CONTAINER STORAGE UNIT
- SWMU 6 FORMER WASTEWATER TREATMENT WORKS
- AOC 1 STAINED SOIL BETWEEN BUILDINGS
- AOC 2 EAST PARKING LOT

NOTE: LOCATION OF SWMU 6 WITHIN DORR STREET PROPERTY IS UNKNOWN.

NOT TO SCALE

MIDLAND ROSS SURFACE COMBUSTION DIVISION
TOLEDO, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

According to Jay Shah of Surface Combustion, Inc., Midland Ross operated at both the North Westwood Avenue and Dorr Street properties until about 1976, when Midland Ross split the Surface Combustion Division into two divisions: Thermal Systems and Surface Combustion. From 1977 to 1986, research and development was conducted by Midland Ross Thermal Systems Division at 900 North Westwood Avenue, including the operation of a batch pyrolyzer, rotary pyrolyzer, scrubber, and fume incinerator, collectively referred to as the Former Pyrolyzer/Incinerator (SWMU 1). Midland Ross Thermal Systems Division also operated a container storage unit, referred to as the Former Indoor Container Storage Area (SWMU 2).

The Surface Combustion Division continued to manufacture high temperature furnaces at Dorr Street until about 1983, when manufacturing operations ceased (PRC, 1992a). The Midland Ross facility received a National Pollutant Discharge Elimination System (NPDES) permit for discharging noncontact cooling water from a "wastewater treatment works located at 2375 Dorr Street," (Former Wastewater Treatment Works, SWMU 6) to a local ditch called Williams Ditch, which intersects the far southeast corner of the facility. The permit was effective April 17, 1978 and expired April 16, 1983. Although the source of the noncontact cooling water was not determined, testing the heat treating equipment being manufactured at Dorr Street may have required the use of cooling water. No other information regarding the wastewater treatment works was in either EPA or OEPA files reviewed during the PA.

Fosterman Little (FL) Aerospace purchased Midland Ross in 1985 and combined the Thermal Systems and Surface Combustion Divisions into one division called Surface Combustion Division. In 1986, FL Aerospace sold the North Westwood Avenue property to the property's current owner, Giant Products Corporation (Giant Products), and research and development operations were relocated from North Westwood Avenue to Dorr Street. The Midland Ross name was retained (PRC, 1992a, and ECI, 1990). By January 1986, the Former Pyrolyzer/Incinerator (SWMU 1) had been moved to its current location at Dorr Street, and a new container storage area, referred to as the Container Storage Unit (SWMU 5), was established at the Dorr Street property (Midland Ross, 1986). The rotary pyrolyzer and scrubber have not been used since the relocation. (The incineration equipment is referred to as the Former Pyrolyzer/Incinerator (SWMU 1) when its location is 900 North Westwood Avenue and Pyrolyzer/Incinerator (SWMU 4) when its location is 2375 Dorr Street.) SWMUs 1 and 2 at North Westwood Avenue underwent RCRA closure in December 1986.

In 1988, FL Aerospace sold the Dorr Street property to its current owner, J & G Corporation (J & G). Also in 1988, the Surface Combustion Division separated from FL Aerospace and became Surface Combustion, Inc. (Surface Combustion). Midland Ross ceased to exist (PRC, 1992a). In August 1989, SWMUs 4 and 5 underwent RCRA closure (OEPA, 1989). Surface Combustion has not used SWMU 5 since its closure. No history of operations of SWMU 5 since it underwent closure in 1989 was in either EPA or OEPA files reviewed during the PA; however, past tenants at Dorr Street appear to have used the area as a paint booth since closure.

Surface Combustion currently leases from J & G about 500 to 600 square feet of space at Dorr Street to conduct its incinerator tests. Other tenants of J & G Corporation lease space at Dorr Street for storage of heavy equipment. The North Westwood Avenue buildings are currently occupied by Giant Products (the property owner) and Builders Steel (a tenant of Giant Products Corporation (PRC, 1992a).

The container storage and incinerator process units (SWMUs 1, 2, 4, and 5) were used to store and treat both hazardous and nonhazardous waste. The wastes used in the treatment tests were received by Midland Ross exclusively from companies (potential customers) considering the purchase of Midland Ross incineration equipment. This is also currently true of Surface Combustion operations, though Surface Combustion does not currently handle hazardous waste. Waste was stored in the Container Storage Unit (SWMU 5) and then incinerated in the Pyrolyzer/Incinerator (SWMU 4). The residue from the incineration process was returned to the Container Storage Unit (SWMU 5). All wastes, including treatment residues and residual, untreated wastes, were then returned to the potential customers using manifests. The nonhazardous wastes that Surface Combustion currently generates in the incinerator is also returned to the potential customer using a manifest. (The OEPA requires both hazardous and nonhazardous industrial process waste to be manifested when transported.) The only wastes associated with the Pyrolyzer/Incinerator (SWMU 4) and the Container Storage Unit (SWMU 5) that have not been returned to a customer were the decontamination wastes generated during RCRA closure. This waste management cycle also existed when Midland Ross operated the Former Pyrolyzer/Incinerator (SWMU 1) and the Former Container Storage Unit (SWMU 2) at the North Westwood Avenue property.

The Pyrolyzer/Incinerator (SWMU 4) is used about three to four times a year. This treatment equipment remains idle until Surface Combustion acquires a potential customer whose waste needs to be tested.

Based on a document entitled "Phase I Environmental Site Assessment," (Phase I Assessment) prepared by Environmental Consultants, Inc. (ECI), August 1990, which was acquired from a representative of Giant Products Corporation during the VSI, the Outdoor Container Storage Unit (SWMU 3) was apparently used to store hazardous waste after mid-1985, when Midland Ross ceased operating at the North Westwood Avenue property (ECI, 1990). The generator of the drummed waste in SWMU 3 was not determined, and the date or dates that the drummed waste in SWMU 3 was removed from the facility were not determined.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the Midland Ross facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

All wastes generated at the Midland Ross facility have originated from the on-site treatment of wastes that were received from potential customers of Midland Ross and, later, Surface Combustion. Wastes received from off site and wastes generated on site were stored at SWMU 2 at North Westwood Avenue, including the wastewater from the wet scrubber, and SWMU 5 at Dorr Street. (The wet scrubber was not operated at Dorr Street.) With the exception of the wet scrubber wastewater, wastes generated on site by the incinerator (SWMU 1 at North Westwood Avenue and SWMU 4 at Dorr Street) have the same composition as the original wastes that are received from off site, except that the generated (treated) wastes lack some compounds, such as organic hydrocarbons, that were present in the waste prior to treatment. After treatment tests were complete, all wastes (residual, untreated waste; treated residue; and wet scrubber waste water) were manifested and returned to the potential customer

An exception to the cycle of waste receipt, treatment, generation, and return to the potential customer, as mentioned above, is the storage of uncategorized, drummed waste in the Outdoor Container Storage Unit (SWMU 3). SWMU 3 may have stored hazardous waste, because photographs taken by ECI during the Phase I Assessment in August 1990 showed square, yellow labels (indicative of hazardous waste) on drums located at SWMU 3. Both the origin and the disposal of the waste in SWMU 3 are unknown.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1 ^b	Former Pyrolyzer/Incinerator	Yes	RCRA closure on December 9, 1986; relocated to Dorr Street
2 ^b	Former Indoor Container Storage Unit	Yes	RCRA closure on December 9, 1986; relocated to Dorr Street
3	Outdoor Container Storage Unit	Unknown	Inactive; no RCRA closure
4	Pyrolyzer/Incinerator	Yes	Active; RCRA closure on August 11, 1989; manages non-hazardous waste
5	Container Storage Unit	Yes	Inactive; RCRA closure on August 11, 1989
6	Former Wastewater Treatment Works	Unknown; waste managed at this unit is not known	Removed from the facility at an unknown date

Notes:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

^b An interoffice memorandum dated December 9, 1986, from Rich Dreschel, OEPA, to Tom Crepeau, OEPA, documents Dreschel's closure certification inspection of SWMUs 1 and 2 and mentions that no evidence of contamination exists. However, a closure plan had not been submitted to OEPA at that time. On April 1, 1987, EPA approved Midland Ross' Partial Closure Plan for the North Westwood Avenue hazardous waste management units (SWMUs 1 and 2). Since the plan represented cleanup activities already performed, closure was considered complete (EPA, 1987e).

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^{a, b}</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Paint Sludge/D007, D008, F003, and F005	Received from off site from potential customers of Midland Ross	1, 2, 4, and 5
Waste Paint/D001, D007, and D008	Received from off site from potential customers of Midland Ross	1, 2, 4, and 5
Reactor Bottoms/D001	Received from off site from potential customers of Midland Ross	4 and 5
Treatment Residues/D007, D008, F003, and F005	Incineration tests at North Westwood Avenue and Dorr Street properties	1, 2, 4, and 5
Wet Scrubber Wastewater/F003 and F005; hazardous characteristics are not known	Wet scrubber at North Westwood Avenue property	1 and 2
Waste Fiberglass/(NA)	Received from off site from potential customers of Midland Ross	4
Scrap Stainless and Carbon Steel/(NA)	Received from off site from potential customers of Midland Ross	4
Waste Lycra/(NA)	Received from off site from potential customers of Midland Ross	4 and 5
Waste Capped Glycol/(NA)	Received from off site from potential customers of Midland Ross	4 and 5

TABLE 2 (Continued)
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^{b,c}</u>
Wastewater/(NA)	Source unknown; a wastewater treatment works discharged to an on-site ditch	6
Uncategorized Drummed Waste/(Unknown)	Source unknown; some drums possessed yellow labels indicative of hazardous waste	3

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b "Unknown" designates no hazardous waste determination is available.

Midland Ross did not want their interim status permit to restrict the types of wastes that they could accept; therefore, Midland Ross' Part A permit application lists nearly all hazardous waste codes (Midland Ross, 1981a). The application includes the following waste codes:

D001 to D003,
F001 to F018,
P001 to P122,
U001 to U098,
U100 to U239, and
K009 to K069.

Few of these waste codes represent hazardous wastes that have actually been received from off site and managed in the North Westwood Avenue and Dorr Street operations. Hazardous wastes that Midland Ross received and managed at both facilities prior to their respective full RCRA closures included paint sludge (D007, D008, F003, and F005) and waste paint (D001, D007, and D008). Paint sludges and waste paint were typical wastes managed by Midland Ross at the North Westwood Avenue and the Dorr Street properties prior to their respective RCRA closures (PRC, 1992b). A wet scrubber wastewater (F003 and F005; hazardous characteristics are not known) was also generated and stored at the North Westwood Avenue location. Scrubber wastewater was placed in drums and returned to the potential customer. In addition to the paint sludge and waste paint, the Pyrolyzer/Incinerator (SWMU 4) and the Container Storage Unit (SWMU 5) at Dorr Street also received reactor bottoms (D001) between 1986 and 1989; receipt of hazardous waste at Dorr Street was more likely to have occurred near 1986 than 1989 (Surface Combustion, 1988a). There is no information indicating that additional hazardous wastes were managed at the facility.

The Midland Ross facility received a NPDES permit to discharge noncontact cooling water from "the wastewater treatment works located at 2375 Dorr Street," (Former Wastewater Treatment Works, SWMU 6) but no information regarding the permitted discharge, the source of the wastewater, or the nature of the wastewater treatment works was in either EPA or OEPA files reviewed for the PA.

Since the Pyrolyzer/Incinerator (SWMU 4) and the Container Storage Unit (SWMU 5) at Dorr Street underwent RCRA closure, Surface Combustion has been receiving scrap stainless and carbon steel (nonhazardous) and waste fiberglass (nonhazardous) for incineration testing. During the incineration testing process, two drums of scrap steel or fiber glass waste are placed in the

batch pyrolyzer. The organic component, such as oil that adheres to the surface of the scrap steel, is volatilized in the pyrolyzer's anoxic environment. The flow of air within the pyrolyzer is controlled to reduce particulates. Then the volatilized organics pass to the fume incinerator, where they are destroyed. The design data is collected during this process. When the test is complete, the nonhazardous, treated scrap steel or fiber glass is removed from the batch pyrolyzer. Treated scrap steel and treated scrap fiber glass are the only wastes Surface Combustion currently generates. The waste and any residual, untreated waste are returned to the potential customer (PRC, 1992b).

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

In a letter dated July 2, 1987, to Midland Ross, EPA states that based on Midland Ross' Certification for Potential Releases and EPA's RCRA Facility Assessment (RFA) report dated June 26, 1986, the Midland Ross facility is not subject to corrective measures (EPA, 1987a). EPA's RFA report was not in either EPA or OEPA files reviewed during the PA, but the Phase I Assessment prepared for Giant Products Corporation by ECI was available. This assessment appears to represent a change in on-site conditions between 1986, when the RFA report was written, and 1990, when the Phase I Assessment observations were made. Specifically, leaking drums of unknown contents were observed at the Outdoor Container Storage Unit (SWMU 3) in August 1990.

No air permits or air emission violations for the incinerator (SWMUs 1 and 4) were in either EPA or OEPA files reviewed during the PA. No NPDES permit violations for discharges from the Former Wastewater Treatment Works (SWMU 6) are in either EPA or OEPA files reviewed during the PA.

2.5 REGULATORY HISTORY

The Midland Ross facility received a NPDES permit from OEPA on April 17, 1978, for discharging noncontact cooling water from a "waste water treatment works" at Dorr Street to a local ditch called Williams Ditch, which intersects the far southeast corner of the facility. The NPDES permit expired April 16, 1983, and no renewal of the permit is evident (Midland Ross,

1978). There was no information in either EPA or OEPA files reviewed during the PA indicating whether Midland Ross ever exceeded the permit restrictions for this SWMU.

Midland Ross submitted a Notification of Hazardous Waste Activity Form to EPA on October 6, 1981, as a treatment, storage, and disposal facility. No waste codes were indicated on the form (Midland Ross, 1981b). Midland Ross submitted a Part A permit application to EPA on October 6, 1981, for incineration (T03) (SWMU 1) and container storage (S01) (SWMU 2) (Midland Ross, 1981a). The name for this facility at that time was Midland Ross Thermal System Technical Center. A revised Part A permit application reflecting a change from 500 gallons to 1000 gallons of container storage (S01) (SWMU 2) was submitted April 8, 1983. In 1985, Midland Ross relocated their operations from North Westwood Avenue to the contiguous property, which is separated by a railroad right-of-way, on Dorr Street. Midland Ross submitted a revised Notification of Hazardous Waste Activity form and a Part A permit application on September 10, 1985, reflecting the changed location address and the name change from Midland Ross Thermal System Technical Center to Midland Ross Corporation, Surface Combustion Division (Midland Ross, 1985a; and Midland Ross, 1985b). Midland Ross submitted another revised Part A permit application, which EPA received February 5, 1986. The revised Part A permit application added the process unit T04 (SWMU 1) to more accurately describe the pyrolysis treatment activity.

OEPA conducted Compliance Evaluation Inspections (CEI) on March 18, 1983, February 14, 1984, August 28, 1985, and June 9, 1986. Violations observed during the first CEI were resolved by Midland Ross shortly after the CEI was conducted, and no violations were noted on all subsequent CEIs (Midland Ross, 1983a; Midland Ross, 1983b; Midland Ross, 1983c; OEPA, 1983a; OEPA, 1983b; OEPA, 1984; OEPA, 1985; and OEPA, 1986).

On November 19, 1985, EPA issued an Administrative Complaint and Compliance Order (ACACO) to Midland Ross for operating a hazardous waste treatment and container storage facility without a RCRA permit or interim status (EPA, 1985), because Midland Ross submitted its initial Part A permit application late (Midland Ross, 1981a). However, an Administrative Order Dismissing Complaint and Compliance Order was issued on January 31, 1986, because on September 4, 1981, EPA had sent Midland Ross a letter that protected Midland Ross from EPA administrative action for filing a Part A permit application late (EPA, 1986a, and EPA, 1986b).

On July 29, 1986, EPA requested that Midland Ross submit a Part B permit application by November 8, 1986 (EPA, 1986c). Although no application is in the EPA or OEPA files, a Part B

permit application apparently was submitted to EPA and OEPA, reviewed, and denied (EPA, 1987b; EPA, 1987c; and EPA, 1987d).

On April 1, 1987, EPA approved Midland Ross' Partial Closure Plan for the North Westwood Avenue hazardous waste management units (SWMUs 1 and 2). Since the plan represented cleanup activities already performed, closure was considered complete (EPA, 1987e).

In January 1988, Midland Ross received a Notice of Violation from OEPA for failure to update the 1987 Closure Cost Estimate for the Dorr Street operations (OEPA, 1988a). No response from Midland Ross, or the newly formed corporation, Surface Combustion, to OEPA regarding the Closure Cost Estimate was found in OEPA or EPA files. In March 1988, OEPA requested that Surface Combustion submit a Part B permit application, presumably for the Dorr Street operations (OEPA, 1988b). Surface Combustion informed OEPA in April 1988 that Surface Combustion was planning to undergo RCRA closure for SWMUs 4 and 5 (Surface Combustion, 1988b). Surface Combustion submitted its Closure Plan for SWMUs 4 and 5 to OEPA on June 9, 1988 (Surface Combustion, 1988a). The Closure Plan was approved by OEPA and EPA, and final closure was confirmed in an OEPA letter dated August 11, 1989 (OEPA, 1989).

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate of Lucas County is moderated by its proximity to Lake Erie. The average daily temperature is 49 degrees Fahrenheit (°F). The lowest average daily temperature is 23 °F in January. The highest average daily temperature is 72 °F in July (USDA, 1980).

The total annual precipitation for the county is 31 inches (USDA, 1980). The mean annual lake evaporation for the area is 31 inches (USDC, 1968). The heaviest 1-day (24-hour) rainfall during the period of 1955 to 1975 was 4.34 inches in July 1969 (USDA, 1980).

The prevailing wind is from the west-southwest with a maximum average wind speed of 11 miles per hour in April (USDA, 1980).

2.6.2 Flood Plain and Surface Water

The southeast corner of the Midland Ross facility intersects Williams Ditch, which is located within the 100-year flood boundary, and the facility is a few feet from the 500-year flood boundary (FEMA, 1980). No SWMUs are located within the 100-year flood boundary. No obvious surface water drainage patterns were observed during the VSI. The nearest surface water, the Ottawa River, is located 0.7 mile northwest of the facility and is used for recreational purposes. The Ottawa River flows northeast and discharges into Lake Erie.

2.6.3 Geology and Soils

No site-specific geological information is available. The following is based on county and regional information.

Lucas County is on a nearly level plain. The landscape slopes gently to the southeast toward the Maumee River and northeast toward Lake Erie. The soils in the region are postglacial in nature and typically unconsolidated clay, sand, and gravel. Most of the bedrock in the area is at a depth of 20 to 60 feet (USDA, 1980).

Well logs for private wells in the area describe approximately the first 130 feet below ground surface (bgs) as clay-like. A variety of Silurian limestone, which are waterbearing strata, from brown to blue are located from 130 feet to 630 feet bgs (ODNR, 1992).

2.6.4 Ground Water

The main supply of ground water for the area is located in the sandy area of the county where water collects above the impervious glacial till. This water table ranges in depth from 15 to 25 feet bgs (USDA, 1980). Studies by the Ohio Department of Natural Resources (ODNR) have determined that most of the water-bearing bedrock is dolomite (USDA, 1980). The amount of water in this rock depends on its size and the number of small cavities in the rock (USDA, 1980).

Well logs dated 1935 and 1945 for two private wells located within 3 miles of the Midland Ross facility indicate that the static water level in bedrock varies between 160 to 235 feet (ODNR, 1992). The Toledo Board of Health has no records indicating that either of these two wells are

currently used. In addition, the Toledo Board of Health has no record of other wells in the area that are currently used as drinking or industrial water supply (PRC, 1992c).

2.7 RECEPTORS

The facility occupies approximately 25 acres in an industrial, commercial, and residential mixed-use area in Toledo, Lucas County, Ohio. In 1980, the City of Toledo had a population of approximately 354,000 (World Almanac, 1990).

The facility is bordered on the north by a cemetery, on the west by commercial businesses and one residence, on the south by a commercial business named Adams Wholesalers, and on the east by residences and light industrial businesses. The nearest residence is located about 100 feet west of the facility. Thirteen schools and one park are located within 2 miles of the facility. One school, Saint Hyacinth School, is located about three tenths of a mile from the facility. The following park and schools are located between one-half mile and one mile from the facility: Ottawa Park, Ryder School, Toledo University, Gesu School, Nathan Hale School, and Saint Stanislaus School. The following schools are located between one mile and two miles from the facility: Lincoln, Zion, Old Orchard, Indiana, Saint Anthony, Saint Charles, and Burroughs. Access to the facility is restricted by a perimeter fence; however, access through fence gates is not monitored, and open gates were observed during the VSI. Several garage doors that allowed unrestricted access to the facility were observed at North Westwood Avenue and Dorr Street.

The nearest surface water, the Ottawa River, is located 0.7 mile northwest of the facility and is used for recreational purposes. The Ottawa River flows northeast and discharges to Lake Erie. Williams Ditch intersects the facility property boundary; however, Williams Ditch does not regularly contain surface water, and the ditch is not considered a wetland. Another body of surface water in the area is the Maumee River, which is more than 2 miles southeast of the facility and is used for recreational purposes.

Ground water in the area is not currently used as a municipal or private water supply. Wells logs of private wells indicate that the static water level in bedrock varies between 160 to 235 feet. Current use of these private wells is not indicated on well logs or other documents reviewed during the PA (ODNR, 1992).

Sensitive environments are not located on site (USDI, 1977). The 100-year flood zone follows the path of Williams Ditch, which crosses the far southeast corner of the facility (FEMA, 1980). However, Williams Ditch is not a sensitive environment (USDI, 1977). The nearest sensitive environment is an unnamed, palustrine, forested wetland located 0.8 mile southwest of the facility (USDI, 1977).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Pyrolyzer/Incinerator

Unit Description:

This SWMU consisted of a batch pyrolyzer, a rotary pyrolyzer, an afterburner (incinerator), and a wet scrubber. It was located within a building at 900 North Westwood Avenue.

The batch pyrolyzer is a top-loading box furnace with internal dimensions of 8 feet long by 4 feet wide by 4 feet high. It is fueled by natural gas. Details of the rotary pyrolyzer were not available for this report. The afterburner is a fume incinerator 10 feet long with a 2-foot internal diameter. It is fueled by natural gas. The incinerator has a maximum temperature of 2200 °F. The scrubber is a wet scrubber with a 30-inch diameter.

Date of Startup:

Midland Ross began operating this SWMU in December 1977.

Date of Closure:

RCRA closure of this SWMU was completed on December 9, 1986.

Wastes Managed:

Hazardous wastes managed include paint sludge (D007, D008, F003, and F005), waste paint (D001, D007, and D008), and the treatment residue (D007, D008, F003, and F005), including scrubber wastewater, generated from the treatment of these paint-related wastes. Nonhazardous wastes managed on site are not known.

Release Controls:

This SWMU was located on a concrete floor within a building.

**History of
Documented Releases:**

No releases from this SWMU have been documented. Initial rinse water generated during closure of this unit contained low levels of total lead (12 mg/L) and mercury (0.42 mg/L). Midland Ross believed that the reason for the presence of mercury was a minor spill of manometers (date unknown). Midland Ross hypothesized that the lead was present due to the spray painting of nearby equipment.

Observations:

No floor drains, cracks, or stains were observed on the concrete floor during the VSI (see photograph number 1).

SWMU 2

Former Indoor Container Storage Unit

Unit Description:

This SWMU is a 12-foot by 12-foot area of the concrete floor within the northernmost building at 900 North Westwood Avenue. The storage capacity of this SWMU was 18 55-gallon drums.

Date of Startup:

Midland Ross began operating this SWMU in December 1977.

Date of Closure:

RCRA closure of this SWMU was completed on December 9, 1986.

Wastes Managed:

Hazardous wastes managed include paint sludge (D007, D008, F003, and F005), waste paint (D001, D007, and D008), and the treatment residue (D007, D008, F003, and F005), including scrubber wastewater, generated from the treatment of these paint-related wastes. Nonhazardous wastes managed on site are not known.

Release Controls:

This SWMU consisted of a concrete floor within a building.

**History of
Documented Releases:**

No releases from this SWMU have been documented. A composite sample of rinse water, which was generated from the closure of the treatment (incineration) and storage areas, contained low levels of total lead (12 mg/L) and mercury (0.42 mg/L). Midland Ross

believes that the reason for the presence of mercury was a minor spill of manometers (date unknown). Midland Ross hypothesized that the lead was present due to the spray painting of nearby equipment. The incineration and storage areas were cleaned a second time, and the concentrations of total lead (0.52 mg/L) and mercury (0.018 mg/L) were lowered significantly (Midland Ross, 1986).

Observations:	No floor drains, cracks, or stains were observed on the concrete floor during the VSI (see photograph number 2).
SWMU 3	Outdoor Container Storage Unit
Unit Description:	This SWMU is the northwest corner of the asphalt parking lot located east of the North Westwood Avenue buildings. This SWMU is 10 feet by 100 feet and is located a few feet south of the northern property line. Its long axis is oriented east-west.
Date of Startup:	The startup date of this SWMU is unknown.
Date of Closure:	No documentation addressing closure of this unit was available for this report. Photographs showing the presence of drums at this SWMU are included in a Phase I Assessment by ECI for Giant Products Corporation dated August 1990. No drums were observed during the VSI.
Wastes Managed:	Unknown. Photographs included in the Phase I Assessment show some 55-gallon drums with square, yellow labels that are indicative of drums containing hazardous waste.
Release Controls:	This SWMU has an asphalt surface, but cracks in the asphalt are evident.

History of Documented Releases: No releases have been documented from this SWMU; however, ECI reported that leaking drums were observed during the Phase I Assessment.

Observations: The asphalt surface possessed several cracks with vegetative growth during the VSI (see photograph number 3).

SWMU 4 Pyrolyzer/Incinerator

Unit Description: This SWMU consists of a batch pyrolyzer and an afterburner (incinerator). This unit was originally operated at the facility's 900 North Westwood Avenue location.

The batch pyrolyzer is a top-loading box furnace with internal dimensions of 8 feet long by 4 feet wide by 4 feet high. It is fueled by natural gas. The afterburner is a fume incinerator 20 feet long with a 2-foot internal diameter. (After relocation the size of the fume incinerator was changed from 10 feet long to 20 feet long.) It is fueled by natural gas. The incinerator has a maximum temperature of 2200 °F.

Currently this SWMU is located in an area approximately 10 feet by 60 feet on the south end of the main building at Dorr Street. A map of Midland Ross' facility layout that was included with a revised Part A permit application shows this SWMU approximately 30 feet east of its present location (Midland Ross, 1985a).

Date of Startup: Midland Ross began operating this SWMU in late 1986.

Date of Closure: RCRA closure of this SWMU was completed on August 11, 1989. This SWMU continues to manage nonhazardous waste.

Wastes Managed: Paint sludge (D007, D008, F003, and F005); waste paint (D001, D007, and D008); reactor bottoms (D001); waste fiberglass

Release Controls: This SWMU is located on a concrete floor within a building.

Observations: During the VSI no floor drains were observed on the concrete floor, but minor cracks in the concrete were observed. Steel train rails are embedded into the concrete floor but are not currently utilized. No cracks existed in the concrete along the length of the rail (see photograph numbers 4 and 5).

Unit Description: This SWMU is an L-shaped room with a concrete floor located within the south end of the main building at Dorr Street,. Within the room, wooden curbing 7½ inches high served as secondary containment and was sealed to the concrete floor with flashing cement. The outline of the wooden curbing was also L-shaped. The top part of the wooden curbing "L" is 9 feet 8 inches by 8 feet 8 inches. The bottom part of the wooden curbing "L" is 14 feet 6 inches by 14 feet 9 inches. This SWMU was intended to store a maximum of 18 55-gallon drums.

Date of Closure: RCRA closure of this SWMU was completed on August 11, 1989.

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(nonhazardous); scrap stainless and carbon steel (nonhazardous); waste lycra (nonhazardous); and waste capped glycol (nonhazardous).

Release Controls:

Drums of waste were placed in leak-proof trays. The trays measured 31 inches by 60 inches by 9 inches high and had a containment capacity of 72.5 gallons. The concrete floor of the room slopes toward the northeast. Prior to closure the floor had secondary containment curbing made of wood and sealed with flashing cement.

History of Documented Releases:

No releases from this SWMU have been documented.

Observations:

During the VSI no floor drains were observed, but the floor was covered with gray dust. A part of the south end of the room extends further south into a paint booth. In about 1990, the paint booth was operated by a tenant (whose name is not available for this report) of the current owner (J & G) of the building (see photograph number 6).

SWMU 6

Former Wastewater Treatment Works

Unit Description:

A description of this SWMU is not available for this report. Midland Ross' National Pollutant Discharge Elimination System (NPDES) permit for the Dorr Street location was effective April 17, 1978 and expired April 16, 1983. The permit allowed the discharge of noncontact cooling water from "the wastewater treatment works located at 2375 Dorr Street," to Williams Ditch, which intersects the far southeast corner of the facility property.

Date of Startup:

The startup date of this SWMU is unknown. The facility's NPDES permit was effective April 17, 1978.

Date of Closure: The startup date of this SWMU is unknown. The facility's NPDES permit expired April 16, 1983.

Wastes Managed: Midland Ross' NPDES permit allowed the discharge of noncontact cooling water containing no process waste and other contaminants. The NPDES permit did not allow the addition of water treatment additives. The pH of the discharge had to be maintained at levels between 6.0 and 9.0.

Release Controls: The startup date of this SWMU is unknown.

History of Documented Releases: The closure date of this SWMU is unknown. No violations regarding this SWMU or its discharge were in EPA or OEPA files reviewed during the PA.

Observations: This SWMU does not currently exist.

4.0 AREAS OF CONCERN

PRC identified two AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 Stained Soil Between Building

A Phase I Assessment prepared in August 1990 by Environmental Consultants, Inc. (ECI), for Giant Products Corporation notes an observation of soil stained dark brown with minimal vegetative growth between two buildings at the North Westwood Avenue location (see Figure 2) (ECI, 1990). Additional information is not provided.

AOC 2 East Parking Lot

The Phase I Assessment noted that the asphalt parking lot located east of the buildings at North Westwood Avenue was formerly a storm water retention pond used by Owens-Illinois, which was located on the adjacent property north of Midland Ross. The date that the pond was filled in and converted to a parking lot is not known.

A letter dated September 19, 1986, from Toledo Testing Laboratory, Inc. (TTL), to Giant Products Company was included in the Phase I Assessment. In 1986, Toledo Testing Laboratory, Inc., drilled two soil borings at the east end of the East Parking Lot. Composite soil samples from the two borings were collected at depths of 5 and 10 feet. The soil samples were analyzed for heavy metals (specifically, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). The highest concentration of heavy metals in the samples was 2.8 parts per million (ppm) barium at the 5-foot depth. The other metals were found in concentrations significantly lower than the concentration of barium.

TTL also utilized a nonintrusive metal detector throughout the East Parking Lot to locate several areas with high subsurface magnetic response. Many objects appeared to be larger than 2 feet across.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and two AOCs at the Midland Ross facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 Former Pyrolyzer/Incinerator

Conclusions: This SWMU consists of a batch pyrolyzer, a rotary pyrolyzer, an afterburner (incinerator), and a wet scrubber.

The batch pyrolyzer is a top-loading box furnace with internal dimensions of 8 feet long by 4 feet wide by 4 feet high. It is fueled by natural gas. Details of the rotary pyrolyzer were not available for this report. The afterburner is a fume incinerator 10 feet long with a 2-foot internal diameter. It is fueled by natural gas. The scrubber is a wet scrubber with a 30-inch diameter.

No air permits or air emission violations were in either EPA or OEPA files reviewed during the PA.

The probability that a release occurred to ground water, surface water, air, or on-site soils is low, because closure confirmed that no contamination existed after cleaning of the SWMU's concrete floor, and the SWMU was moved to Dorr Street and is now SWMU 4.

Recommendations: PRC recommends a closure equivalency demonstration be performed.

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SWMU 2

Former Indoor Container Storage Unit

Conclusions:

This SWMU is a 12-foot by 12-foot area of the concrete floor within the northernmost building at 900 North Westwood Avenue. The storage capacity of this SWMU was 18 55-gallon drums.

The probability that a release occurred to ground water, surface water, air, or on-site soils is low, because OEPA's closure verification inspection on December 9, 1986, confirmed that no contamination existed after cleaning of the SWMU's concrete floor, and the SWMU was moved to Dorr Street and is now SWMU 5.

Recommendations:

PRC recommends a closure equivalency demonstration be performed.

SWMU 3

Outdoor Container Storage Unit

Conclusions:

This SWMU is a former asphalt parking lot at North Westwood Avenue. The SWMU is located approximately 20 feet west of the western-most building and a few feet south of the northern property line. The dimensions of the SWMU are approximately 10 feet by 100 feet, and its long axis is oriented east-west.

This SWMU was observed by ECI during a Phase I Assessment in August 1990. During the assessment, ECI observed some leaking drums of unknown contents. During the VSI, conclusive evidence of these leaking drums was not observed.

The potential for release to ground water, surface water, air, or on-site soils is low, because waste is no longer stored at this SWMU and only minor staining of the asphalt was observed during the VSI. However, the probability that a release to environmental media has occurred in the past is summarized below.

Ground Water: Moderate. In August 1990, leaking drums with unknown contents were observed at this SWMU during a Phase I Assessment. At the

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time of the VSI, the asphalt surface of this SWMU possessed moderate sized cracks exposing soil. Though the cracks may have increased in width in the last two years, the cracks probably existed at the time the Phase I Assessment was conducted.

Surface Water: Low. No surface water bodies are in close proximity to the facility.

Air: Moderate. The contents of leaking drums were exposed to the air. The volatility of the leaking material is unknown.

On-site Soils: Moderate. In August 1990, leaking drums with unknown contents were observed at this SWMU during a Phase I Assessment. At the time of the VSI, the asphalt surface of this SWMU possessed moderate sized cracks exposing soil. Though the cracks may have increased in width in the last two years, the cracks probably existed at the time the Phase I Assessment was conducted.

Recommendations: PRC recommends sampling the soil below the asphalt and analyzing the soil samples for heavy metals and organic solvents.

SWMU 4 Pyrolyzer/Incinerator

Conclusions: This SWMU consists of a batch pyrolyzer and an afterburner (incinerator). These units were originally operated at North Westwood Avenue until their relocation to Dorr Street. After relocation the fume incinerator was changed from a length of 10 feet to 20 feet. This SWMU went through RCRA closure on August 11, 1989. However, this unit is still used to manage nonhazardous waste on a very limited basis. The potential for release to environmental media is summarized below.

Ground Water: Low. This SWMU is located in a building on a concrete floor that has no cracks or floor drains.

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Surface Water: Low. This SWMU is located in a building on a concrete floor that has no cracks or floor drains.

Air: Low. This SWMU operates as a closed system. The batch pyrolyzer volatilizes organics while maintaining a low particulate concentration in the confined air mass within the pyrolyzer. The confined air mass is then conveyed to the incinerator, where the volatiles are incinerated. The air leaving the incinerator is exhausted outside the building. No air emission violations were in either EPA or OEPA files reviewed during the PA.

On-site Soils: Low. This SWMU is located in a building on a concrete floor that has no cracks.

Recommendations: PRC recommends no further action at this time.

SWMU 5 Container Storage Unit

Conclusions: This SWMU is located in a room with a concrete floor. The room is located on the south end of the main building at Dorr Street. This SWMU went through RCRA closure on August 11, 1989.

The probability that a release to ground water, surface water, air, or on-site soils occurred in the past is low, because closure confirmed that no contamination existed after cleaning of the SWMU's concrete floor.

Recommendations: PRC recommends no further action at this time.

SWMU 6 Former Wastewater Treatment Works

Conclusions: A description of this SWMU was not available for this report. Midland Ross' NPDES permit for Dorr Street was effective April 17, 1978, and expired April 16, 1983. The permit allowed the discharge of noncontact cooling water from "the wastewater treatment works located at 2375 Dorr Street," to Williams Ditch, which intersects the far southeast corner of the facility property. No confirmation that this SWMU existed and discharged

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to Williams Ditch was available. The probability that a release to ground water, surface water, air, or on-site soils occurred in the past is low, because there was no information indicating whether Midland Ross ever exceeded the permit restrictions for this SWMU.

Recommendations: PRC recommends no further action at this time.

AOC 1 Stained Soil Between Buildings

Conclusions: A Phase I Assessment prepared in August 1990 by Environmental Consultants, Inc. (ECI), noted an observation of soil stained dark brown with minimal vegetative growth between two buildings at the North Westwood Avenue location (see Figure 2) (ECI, 1990). Additional information is not provided. During the VSI, this area was only casually observed, because at that time PRC had no knowledge of the Phase I Assessment. The incidental observation during the VSI provided no information confirming the existence of a stain between the buildings.

Recommendations: PRC recommends additional and thorough observation of this area and soil sampling and analysis for organics if staining is confirmed.

AOC 2 East Parking Lot

Conclusions: The Phase I Assessment noted that the asphalt parking lot east of the buildings at the North Westwood Avenue location was formerly the location of a storm water retention pond used by Owens-Illinois. Owens-Illinois was located on the adjacent property north of Midland Ross. The date that the pond was filled in and converted to a parking lot is not known.

In 1986, Toledo Testing Laboratory, Inc., drilled two soil borings at the east end of the East Parking Lot. Composite soil samples from two borings drilled at the east end of the East Parking Lot in 1986 by Toledo Testing Laboratory, Inc., were collected at depths of 5 and 10 feet. The highest concentration of heavy metals in the samples was 2.8 parts per million

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(ppm) barium at the 5 foot depth. Other metals were found in concentrations significantly lower than the concentration of barium.

TTL also used a nonintrusive metal detector throughout the East Parking Lot and located several areas with high subsurface magnetic response. The magnetic response observed indicated that these subsurface objects were larger than 2 feet across.

Recommendations: PRC recommends investigating the presence of drums or tanks below the East Parking Lot (AOC 2) and sampling of any areas suspected of containing buried drums or tanks.

RELEASED 3/24/99
DATE _____
RIN # 1639-99
INITIALS m

ENFORCEMENT
CONFIDENTIAL

TABLE 3

SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Pyrolyzer/ Incinerator	December 1977 to December 9, 1986 (RCRA closure)	No	Perform closure equivalency demonstration
2. Former Indoor Container Storage Unit	December 1977 to December 9, 1986 (RCRA closure)	No	Perform closure equivalency demonstration
3. Outdoor Container Storage Unit	Unknown; observed in August 1990 during Phase I Environmental Site Assessment	Yes	Sampling soil below the asphalt; analyzing the samples for heavy metals and organic solvents
4. Pyrolyzer/ Incinerator	Late 1986 to present; RCRA closure August 11, 1989	No	None
5. Container Storage Unit	Late 1986 to August 11, 1989 (RCRA closure)	No	None
6. Former Wastewater Treatment Works	Unknown; discharge was permitted from April 17, 1978 to April 16, 1983	No	None

RELEASED
DATE 3/24/99
RIN # 639-99
INITIALS MV

ENFORCEMENT
CONFIDENTIAL

TABLE 3 (Continued)
SWMU AND AOC SUMMARY

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Stained Soil Between Buildings	Unknown; observed August 1990	Yes	Additional, thorough observation of this area; soil sampling and analysis for organics if staining is confirmed
2. East Parking Lot	Unknown; Existed at least as early as September 1986	Yes	Investigating the presence of drums or tanks below asphalt; sampling soil of any areas suspect of containing buried drums or tanks

REFERENCES

- Environmental Consultants, Inc. (ECI), 1990. Phase I Environmental Site Assessment, August.
- Federal Emergency Management Agency (FEMA), 1980. Flood Insurance Rate Map - City of Toledo, Ohio, Lucas County. Community-Panel Number 395373 0020 A, June 4.
- Midland Ross Corporation (Midland Ross), Surface Combustion Division, 1978. National Pollutant Discharge Elimination System permit, April 17.
- Midland Ross, 1981a. Part A permit application, October 6.
- Midland Ross, 1981b. Notification of Hazardous Waste Activity Form, October 6.
- Midland Ross, 1983a. Letter to Kathy Homer, EPA, from Michael R. Babbitt, Midland Ross, requesting that EPA waive the requirement that ignitable hazardous waste must be stored greater than 50 feet from the property line, April 4.
- Midland Ross, 1983b. Letter to David L. Ferguson, OEPA, from Jay K. Shah, Midland Ross, responding to OEPA's March 30, 1983, letter, April 21.
- Midland Ross, 1983c. Letter to Thomas Crepeau, OEPA, from Michael R. Babbitt, Midland Ross, requesting that OEPA waive the requirement that ignitable hazardous waste must be stored more than 50 feet from the property line, April 4.
- Midland Ross, 1985a. Revised Part A permit application, September 10.
- Midland Ross, 1985b. Revised Notification of Hazardous Waste Activity form, September 10.
- Midland Ross, 1986. Letter from Jay K. Shah, Midland Ross, to Kenneth Chiu, U.S. Environmental Protection Agency (EPA), October 27.
- Ohio Department of Natural Resources (ODNR), 1992. Ground Water Resources, Area Well Logs.
- Ohio Environmental Protection Agency (OEPA), 1983a. Letter from David L. Ferguson, OEPA, to Jay K. Shah, Midland Ross, listing violations observed during OEPA's March 18, 1983, Compliance Evaluation Inspection (CEI), March 30.
- OEPA, 1983b. Letter from David L. Ferguson, OEPA, to Jay K. Shah, Midland Ross, informing Midland Ross that the facility is in compliance, May 3.
- OEPA, 1984. Letter from David L. Ferguson, OEPA, to Jay K. Shah, Midland Ross, regarding a CEI conducted on February 14, 1984, by OEPA, April 6.
- OEPA, 1985. Letter from David L. Ferguson, OEPA, to Jay K. Shah, Midland Ross, regarding a CEI conducted on August 28, 1985, by OEPA, September 23.
- OEPA, 1986. Letter from David L. Ferguson, OEPA, to Jay K. Shah, Midland Ross, regarding CEI conducted on June 9, 1986, by OEPA, July 9.

- OEPA, 1988a. Letter from Susan McDowell, OEPA, to Michael R. Babbitt, Midland Ross, requesting a revised financial test for Midland Ross' Closure Cost Estimate, January 8.
- OEPA, 1988b. Letter from Richard L. Shank, OEPA, to David Orzechowski, Surface Combustion, Inc. (Surface Combustion), requesting submittal of Part B permit application in six months, March 4.
- OEPA, 1989. Letter from Thomas E. Crepeau, OEPA, to Jay Shah [sic], Midland Ross, confirming final closure of the Midland Ross facility is complete, August 11, 1989.
- PRC Environmental Management, Inc. (PRC), 1992a. Telephone conversation between Jay K. Shah, Surface Combustion, and John Maher, PRC, December 7.
- PRC, 1992b. Telephone conversation between Jay K. Shah, Surface Combustion, and John Maher, PRC, October 28.
- PRC, 1992c. Personal communication between Sandy Anagnostopoulos, PRC, and the Toledo Board of Health, August 27.
- Surface Combustion, 1988a. Letter from T. J. Schultz, Surface Combustion, to R. L. Shank, OEPA, enclosing the final Closure Plan for the Midland Ross facility at Dorr Street, June 9.
- Surface Combustion, 1988b. Letter from T. J. Schultz, Surface Combustion, to Paul Kalter, OEPA, informing OEPA that Surface Combustion plans on closing the Midland Ross facility, April 11.
- U.S. Department of Agriculture (USDA), Soil Conservation Service, 1980. Soil Survey of Lucas County, Ohio, June.
- U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States, U.S. Government Printing Office, Washington, D.C.
- U.S. Department of Interior (USDI), Fish and Wildlife Service, 1977. National Wetlands Inventory Map. Toledo Quadrangle, Ohio, April.
- U.S. Environmental Protection Agency (EPA), 1985. Letter from Basil G. Constantelos, EPA, to Frank Fittipaldi, Registered Agent for Midland Ross, enclosing an Administrative Complaint and Compliance Order, November 19.
- EPA, 1986a. EPA Motion to Withdraw Complaint and Compliance Order, January 28.
- EPA, 1986b. EPA Administrative Order Dismissing Complaint and Compliance Order, January 31.
- EPA, 1986c. Letter from David A. Stringham, EPA, to Michael Babbitt, Midland Ross, requesting Midland Ross submit a Part B permit application, July 29.
- EPA, 1987a. Letter from David A. Stringham, EPA, to Jay K. Shah, Midland Ross, confirming that EPA is reviewing Midland Ross' Part B permit application and requesting Midland Ross to sign a certification statement regarding releases from the facility, April 29.

EPA, 1987b. Letter from Karl Bremer, EPA, to Edwin Lim, OEPA, requesting OEPA perform a final technical adequacy review of Midland Ross' revised Part B permit application and submit comments by June 10, 1987, to EPA, April 30, 1987.

EPA, 1987c. Letter from Karl E. Bremer, EPA, to Jay Shah, Midland Ross, July 2.

EPA, 1987d. Letter from George J. Hamper, EPA, to Edwin Lim, OEPA, requesting OEPA to send a copy of Midland Ross' Part B Permit denial, July 10.

EPA, 1987e. Letter from Warren W. Tyler, EPA, to Michael R. Babbitt, Midland Ross, approving Midland Ross' Partial Closure Plan, April 1.

U.S. Geological Survey (USGS), 1980. Toledo Quadrangle.

World Almanac, 1990. The World Almanac and Book of Facts, 1990. World Almanac, An Imprint of Pharos Books, A Scripps Howard Company, New York, New York.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH	02 SITE NUMBER OHD 097 732 946
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Midland Ross Corporation		02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 2375 Dorr Street			
03 CITY Toledo	04 STATE OH	05 ZIP CODE 43696	06 COUNTY Lucas	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 38' 59" N		LONGITUDE 83° 36' 18" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Entrances are located at 900 North Westwood Avenue and 2375 Dorr Street.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Two owners: J & G Corp. and Giant Products		02 STREET (Business, mailing, residential) 2375 Dorr St. (J&G Corp.); 900 N. Westwood Ave. (Giant Products)			
03 CITY Toledo	04 STATE OH	05 ZIP CODE 43696	06 TELEPHONE NUMBER (419) 891-7150		
07 OPERATOR (if known and different from owner) Surface Combustion, Inc.		08 STREET (Business, mailing, residential) 1700 Indian Wood Circle, P.O. Box 428			
09 CITY Maumee	10 STATE OH	11 ZIP CODE 43537-0428	12 TELEPHONE NUMBER 419/891-7150		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 10 / 08 / 81 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

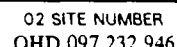
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 09 / 10 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1977 Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Waste paint and paint sludge, waste solvent, waste fiberglass, waste lycra, scrap steel, waste capped glycol					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION A former drum storage area where leaking drums have been observed poses a potential threat to the environment					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT John Maher	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (708) 225-4166	08 DATE 12/07/92 MONTH DAY YEAR	





POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE
OH

02 SITE NUMBER
OHD 097 232 946

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

Leaking drums of unknown contents were observed in August 1990 on a cracked, asphalt surface.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

Leaking drums of unknown contents were observed in August 1990. The contents of the drums were exposed to the air.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: < 1 04 NARRATIVE DESCRIPTION
(Acres)

Leaking drums of unknown contents were observed in the Outdoor Container Storage Area in August 1990.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE
OH

02 SITE NUMBER
OHD 097 232 946

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: Unknown

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Midland Ross Corporation
2375 Dorr Street and 900 North Westwood Avenue
Toledo, Ohio 43691
OHD 097 232 946

Date: September 10, 1992

Primary Facility Representative: Jay K. Shah
Representative Telephone No.: 419/891-7150

Inspection Team: John Maher, PRC Environmental Management, Inc.
David Berestka, PRC Environmental Management, Inc.

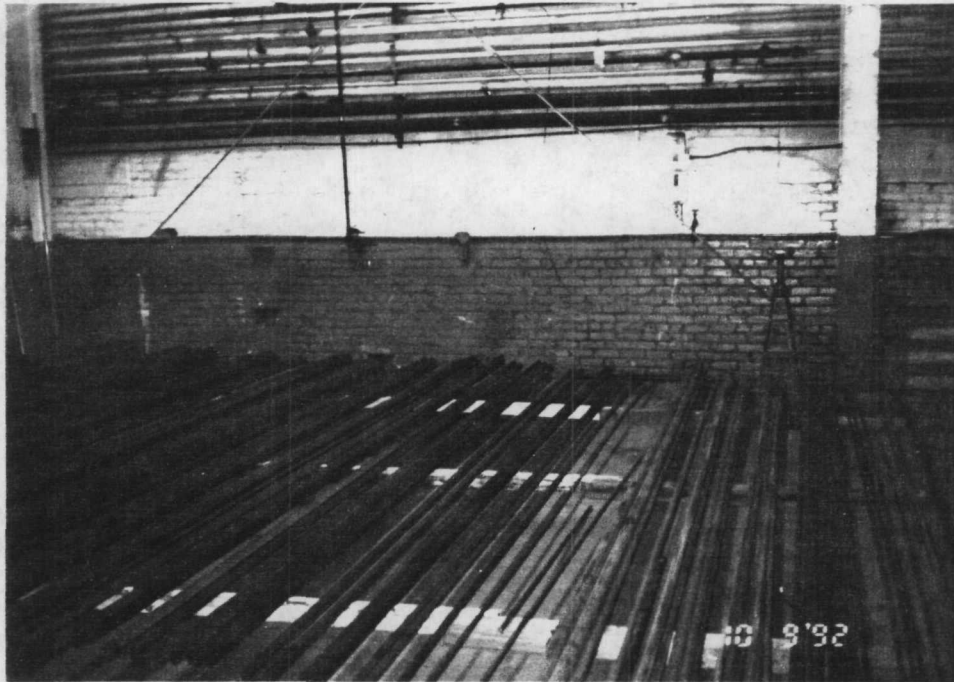
Photographer: David Berestka, PRC Environmental Management, Inc.

Weather Conditions: 65°F; sunny

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 10:45 a.m.

The tour concluded at 11:30 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 12:00 noon. The inspection team returned to the facility at 12:10 p.m. and photographed the Outdoor Container Storage Unit (North Westwood Avenue) (SWMU 3). The inspection team left the facility at 12:15 p.m.



Photograph No. 1

Orientation: North

Description: Former location of the incinerator at North Westwood Avenue.

Location: SWMU 1

Date: September 10, 1992



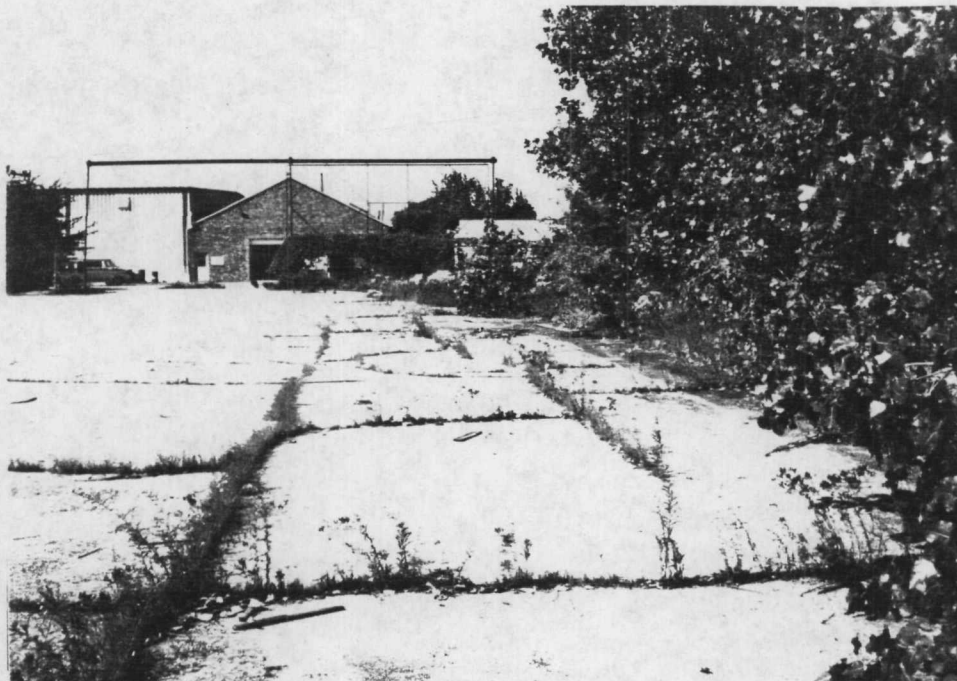
Photograph No. 2

Orientation: South, southwest

Description: Former location of the container storage area at North Westwood Avenue.

Location: SWMU 2

Date: September 10, 1992



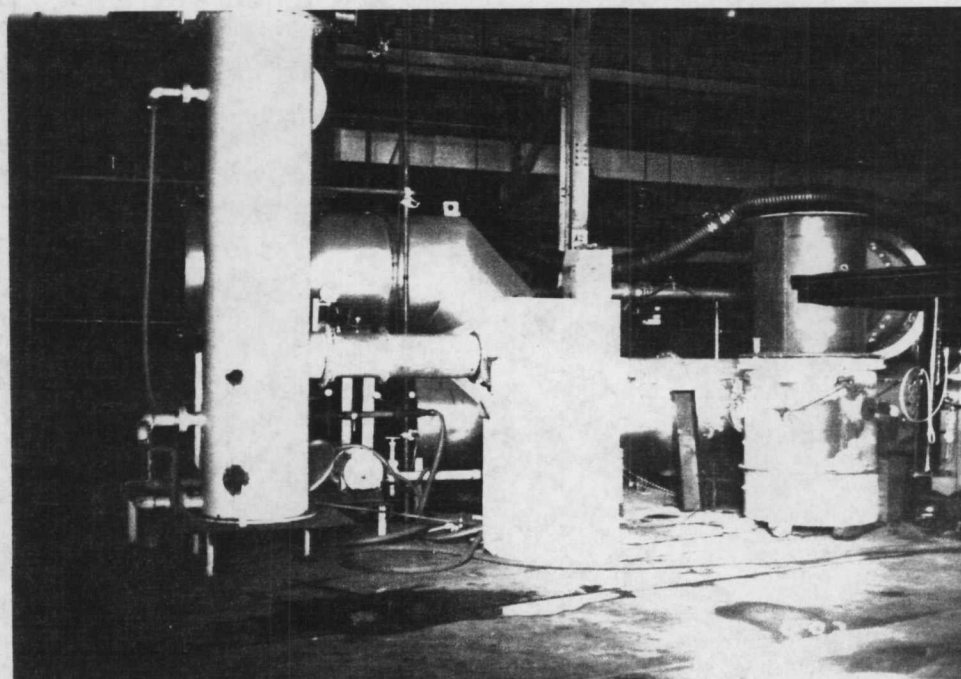
Photograph No. 3

Orientation: West

Description: Former location of the Outdoor Container Storage Unit at North Westwood Avenue.

Location: SWMU 3

Date: September 10, 1992



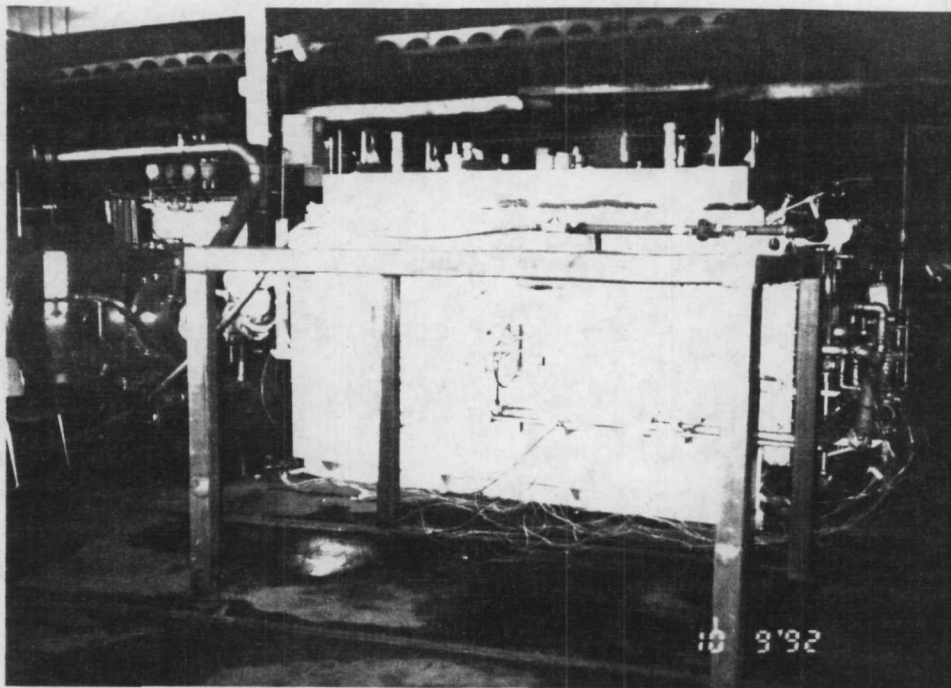
Photograph No. 4

Orientation: West, northwest

Description: Afterburner (fume incinerator) of the incinerator and ancillary equipment at Dorr Street.

Location: SWMU 4

Date: September 10, 1992



Photograph No. 5
 Orientation: West, southwest
 Description: Batch pyrolyzer of the incinerator at Dorr Street.

Location: SWMU 4
 Date: September 10, 1992



Photograph No. 6
 Orientation: Southeast
 Description: Former container storage area at Dorr Street.

Location: SWMU 5
 Date: September 10, 1992

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

9:00 AM Millard Ross

(51)

Called Thermal Div. Systems of
Millard Ross

Budd Richman

In a year get 3-4 customers

R & D takes ~ 3-4 days.

Applied for Part B.

Customers want to recover materials
such as ~~to~~ fiberglass from plastic
materials.

Also can receive computer boards to
test recovery of gold from contacts.

Also, ferrous materials tested in
spray pre-heater.

Closed both facilities

(52)

FL Aerospace bought Midland
All property has been sold
to J & G Industries - leased
by Surface Combustion

Scrubber operated at Door St. but
not connected now.

Pyrolyzer (batch) and Rotary Hearth
(continuous)
↓
Flare incinerator.

Scrubber water was sent off in drum
back to the customer.

Facility used to make heat treating
furnaces. Processes unknown.

On westward: two after burners
one fired down to scrubber
one " up to air when
scrubber not needed

(53)

Now (at Door) only have
one after burner → fired up.

1973 - Treatment process not in current
location → Westward prior 1980
→ closed Westward → relocated
to current location → closed
current location → continue to
operate at this location under lease.

J & G receives ^{from} ~~their~~ customer's
waste for Surface Combustion.

Old operation had painting operation.

Every waste stream could have
been accepted.

Manifested waste back to customer

(54)

Closure manifest:

Sent to Chem Met Services
transporter by Chem Met Services

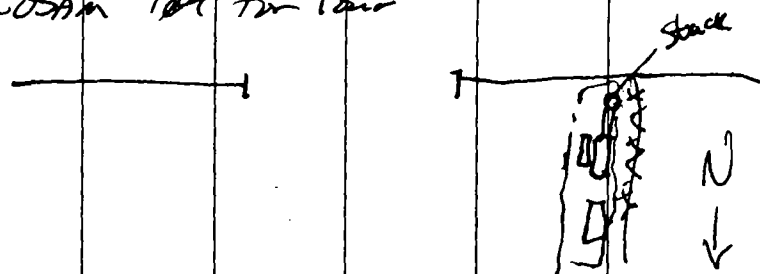
7 DM River water

4 DM Solid Debris

Non-haz 12/15/88

~ 1987 moved from Westwood to Dorr

10:05 AM left for tour



Scrubber not connected

Storage area used to be a paint booth
which was used by Dorman in the
last two years. No longer used

(55)

Concrete floor is rough but
no cracks. Dirt on floor.

Giant Products comes Westwood

Buildings Steel

Distributors of center beam steel
for houses

11:30 AM - ended tour, drove
back to office

12:10 PM - returned to site to
take photos

